

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CURTIS GREEN	:		CIVIL ACTION
	Plaintiff	:	No.
v.		:	
		:	
HELLO FRESH; ABC CORP. 1-10		:	JURY TRIAL DEMANDED
	Defendants	:	

CIVIL ACTION COMPLAINT

I. PARTIES

1. Curtis Green (hereinafter “Plaintiff”) is an adult individual and a citizen of the State of New Jersey

2. Plaintiff is a black Jamaican, and thus in a protected class under 42 U.S.C. 1981.

3. Hello Fresh (hereinafter “Defendant”) is a corporation authorized to do business in the State of New Jersey.

4. ABC Corporations 1-10 are corporations not yet known who have ownership and/or control over Defendant, and who acted as Plaintiff’s employer.

5. At all times material and relevant to this complaint, Defendant was acting by and through its agents, servants, workmen, employees and/or representative who were acting within the course and scope of their employment and/or agency with said Defendant. The conduct, action and/or omissions of the agents, servants, workmen, employees and/or representatives of defendant is imputed to defendant and defendant is fully liable for the conduct, action and/or omissions for its agents, servants, workmen, employees and/or representatives.

II. JURISDICTION AND VENUE

6. Subject matter jurisdiction is appropriate in this Court because this Court has federal question jurisdiction over Plaintiff's 42 U.S.C. § 1981 claims. Personal jurisdiction is appropriate because the Court has general jurisdiction over the Defendant and specific jurisdiction over matters arising out of Plaintiff's employment.

7. Venue is appropriate for this action because this is the vicinage where the events underlying this matter took place.

III. UNDERLYING FACTS

8. Throughout the fall of 2021, Plaintiff repeatedly tried to apply for jobs with the Defendant.

9. However, Plaintiff was rejected and never even given an interview.

10. Frustrated, in November of 2021 Plaintiff changed his name and e-mail address to make himself appear Caucasian.

11. Once Plaintiff made this change, his application was selected for an interview.

12. Plaintiff was repeatedly denied an opportunity to work for Hello Fresh because of his race.

COUNT ONE

Racial Discrimination Under 42 U.S.C. 1981

13. Plaintiff, Curtis Green, incorporates herein, by reference thereto, paragraphs one through twelve inclusive, as though the same were set forth herein at length.

14. Plaintiff was in a protected class due to his race.

15. Plaintiff was denied job opportunities working for the Defendant because of his race.

16. In the treatment of the Plaintiff, Defendant's violated 42 U.S.C. 1981.

17. Defendant's violated 42 U.S.C. 1981 by failing to hire the Plaintiff due to his race.

WHEREFORE, Plaintiff respectfully requests compensatory damages against Defendant, Hello Fresh and ABC Companies 1-10, in excess of \$75,000, together with punitive damages, as well as costs, interest, and other relief the Court may deem appropriate under the circumstances.

JURY DEMAND

Plaintiff demands a trial by jury.

MALAMUT & ASSOCIATES, LLC

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